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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91213869
Party	Defendant Idaho Housing and Finance Association
Correspondence Address	HENRY RUDOLPH SKINNER FAWCETT LLP 515 S 6TH ST BOISE, ID 83702-7634 UNITED STATES hrudolph@skinnerfawcett.com
Submission	Answer
Filer's Name	Matthew Gordon
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Date	01/18/2014
Attachments	IHFA -- Answer to Opposition.pdf(11080 bytes)

<p>Home Loan Investment Bank, FSB,</p> <p style="text-align: center;"><i>Opposer,</i></p> <p>vs.</p> <p>Idaho Housing and Finance Association,</p> <p style="text-align: center;"><i>Applicant</i></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Opposition No.: 91213869</p> <p>Application No. 85951771</p>
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Applicant Idaho Housing and Finance Association, by and through its undersigned attorneys of records, and in answer to the Notice of Opposition filed by Opposer Home Loan Investment Bank, FSB on December 3, 2013, admits, denies and alleges as follows:

Applicant denies all allegations in the Notice of Opposition not specifically admitted herein.

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Notice of Opposition
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Notice of Opposition.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the Notice of Opposition.

4. Applicant denies the allegations in paragraph 4 of the Notice of Opposition.

AFFIRMATIVE DEFENSES

The following defenses are not stated separately as to each allegation of Opposer. Nevertheless, the following defenses are applicable to any and all of Opposer's allegations. In addition, Applicant, in asserting the following defenses, does not admit that the burden of proving allegations or denials contained in the defenses is upon it. Moreover, Applicant does not admit, in asserting in any defense, any responsibility or liability but, to the contrary, specifically denies any and all allegations of responsibility and liability alleged in the complaint.

FIRST AFFIRMATIVE DEFENSE

Opposer's allegations of a likelihood of confusion are unwarranted because the Service Mark referenced by Opposer in its Notice of Opposition, Registration No. 2937895, expressly disclaims the phrase "Home Loan Investment Bank" apart from the design element of such mark.

Respectfully submitted this 18th day of January, 2014.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By /Matthew Gordon/
Matthew Gordon
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CERTIFICATE OF SERVICE

I, Matthew Gordon hereby certify that on this 18th day of January, 2014, a true and correct copy of the foregoing has been served, by First Class U.S. Mail, postage prepaid to:

Kevin B. Murphy
Attorney for Opposer Home Loan Investment Bank
244 Weybosset Street
Providence, RI 02903

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